

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Liberty Property Holdings SC, LLC)	CASE NO. 4:22-CV-03556-RBH
individually, derivatively on behalf of)	
Renaissance Tower Horizontal Property)	
Regime, and on behalf of a class of all other)	
similarly situated; Azure Bleu, LLC;)	
Edelyne Beauvais-Thomas; Jason E.)	
Blosser; Nicole M. Blosser; Eshellah D.)	
Calhoun; Zachary G. Calhoun, David)	
DiMaio; Linda DiMaio; Susan H. Ferguson;)	
Four Parts Whole, LLC; Sharon M.)	
Hubbard; Carol A. Messenger; Jeffrey S.)	
Palmer; Summalin, Inc.; Terry J. Tuminello;)	
Shelley Ware; and Jonathan S. Williams,)	
)	
Plaintiffs.)	
)	
v.)	
)	
Jeffrey L. Richardson; William S. Spears;)	
Brent M. Whitesell; Laurie Z. Wunderley;)	
Madeline R. Mercer; Catherine M. Gregor;)	
Dennis J. Sassa; Tracy A. Meadows; Peter)	
A. Grusauska; and William Douglas)	
Management, Inc.)	
)	
Defendants.)	
)	

**DEFENDANTS'
MOTION TO DISMISS**

Pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, all of the above captioned Defendants move to dismiss the Complaint in its entirety for those reasons set forth in Defendants' Memorandum of Law in Support of their Motion to Dismiss. In addition, the Defendants pray for such other and further relief as this Court may deem just and proper under the circumstances.

[SIGNATURE PAGE TO FOLLOW]

Dated: December 13, 2022

BURR & FORMAN LLP

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